

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:

Camara Bowden,

Debtor.

Chapter 7

Bankruptcy No. 22-00746

Honorable Judge Cassling

**NOTICE OF MOTION**

Please take notice that on **Tuesday, April 26, 2022, at 9:30 A.M.**, or as soon thereafter as counsel may be heard, the undersigned attorneys shall appear before the Honorable Donald R. Cassling, United States Bankruptcy Judge for the Northern District of Illinois, or any other judge sitting in her place and stead, and shall then and there present the **Debtor's Motion to Extend Time to File Reaffirmation**, a copy of which is attached hereto and herewith served upon you.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is 161 414 7941 and the password is 619. The meeting ID and password can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Dated: April 18, 2022

Camara Bowden

By: /s/ Justin R. Storer  
One of his Attorneys

Justin R. Storer (6293889)  
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### **CERTIFICATE OF SERVICE**

I, Justin R. Storer, an attorney, hereby certify that on April 18, 2022, pursuant to Section II.B.4 of the Administrative Procedures for the Case Management/Electronic Case Filing System and Fed.R.Civ.P. 5(a), I caused a copy of the foregoing *Notice of Motion* and the accompanying *Motion to Extend Time to File Reaffirmation* to be served electronically through the Court's Electronic Notice for Registrants on all persons identified as Registrants on the below Service List.

/s/ Justin R. Storer

### **SERVICE LIST**

#### **Registrants in the Case**

(Service via ECF)

Ira Bodenstein [iratrustee@cozen.com](mailto:iratrustee@cozen.com)

Patrick L. Layng [USTPRegion11.ES.ECF@usdoj.gov](mailto:USTPRegion11.ES.ECF@usdoj.gov)

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Honorable Donald Cassling

**DEBTOR'S MOTION TO EXTEND TIME TO FILE REAFFIRMATION**

Since filing their chapter 7 case, the Debtor has remained current on certain secured obligations. He may, but has not conclusively determined, that he would prefer to enter into a reaffirmation on his home mortgage and other secured claims. The deadline fast approaches. The Debtor now moves to extend his deadline to file a reaffirmation agreement.

**JURISDICTION**

1. This Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334, and Local Rule 40.3.1(a) of the United States District Court for the Northern District of Illinois.

2. Venue of the above-captioned case (the “*Case*”) and of this motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b).

**PROCEDURAL HISTORY**

4. On January 23, 2022, the Debtor commenced this bankruptcy case by filing a voluntary petition for relief under chapter 7, pursuant to 11 U.S.C. 301.

5. On February 15, 2022, the Debtor appeared at his first meeting of creditors, which has been continued from time to time.

6. The Debtor may seek to enter into a reaffirmation concerning the first mortgage on his home, as well as any other secured obligation on which he has remained current since the petition date. This may include his liability for work vehicles for which he is jointly liable with his company, which the permanent trustee is presently reviewing for possible liquidation.

7. At present, the deadline to enter into a reaffirmation agreement is April 18, 2022.

### **RELIEF REQUESTED**

8. By this motion, the Debtor requests that the Court enter an order extending the deadline for a reaffirmation agreement to be filed until May 31 2022.

### **BASIS FOR RELIEF REQUESTED**

9. Pursuant to Federal Rule of Bankruptcy Procedure 4008(a), a reaffirmation agreement shall be filed no later than 60 days after the first date set for the meeting of creditors.

10. However, the Court may, at any time and in its discretion, enlarge the time to file a reaffirmation agreement.

### **NOTICE**

11. At least seven days' notice of this motion has been given to: (i) the Office of the United States Trustee; (ii) the permanent trustee, and (iii) any person that has requested notice in the case or that receives notices through the ECF System with respect to the Case.

**WHEREFORE**, the Debtor respectfully request thats the Court enter an order extending the time in which a reaffirmation agreement may

be filed, to and including May 31, 2021, and issuing such other relief as this Court may deem just and proper.

Dated: April 18, 2022

**Camara Bowden,**

By: /s/ Justin R. Storer  
*One of his attorneys*

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